

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

G+ COMMUNICATIONS, LLC

Plaintiff,

V.

SAMSUNG ELECTRONICS CO., LTD.;  
SAMSUNG ELECTRONICS AMERICA,  
INC.;

Defendants.

Case No. 2:22-cv-00078-JRG

## JURY TRIAL DEMANDED

**DECLARATION OF BRADLEY D. LIDDLE IN SUPPORT OF PLAINTIFF'S  
MOTION TO DISMISS DEFENDANTS' COUNTERCLAIM (COUNT I)**

I, Bradley D. Liddle, declare and state as follows:

1. I am an attorney admitted to practice in the State of Texas and am a partner at the law firm of Carter Arnett PLLC, counsel for Plaintiff G+ Communications, LLC (“Plaintiff” or “G+”). I have personal knowledge of the facts in this declaration and would competently testify thereto, if called upon to do so.

2. I submit this declaration in support of Plaintiff's Motion to Dismiss Defendants' Counterclaim (Count I).

3. Attached as **Exhibit A** is a true and correct copy of a letter dated September 8, 2021, from G+ Communications, LLC to Samsung Electronics Co., Ltd.

4. Attached as **Exhibit B** is a true and correct copy of a letter dated February 8, 2022, from G+ Communications, LLC to Samsung Electronics Co., Ltd.

5. Attached as **Exhibit C** is a true and correct copy of a letter dated January 20, 2022,

from G+ Communications, LLC to Samsung Electronics Co., Ltd.

6. Attached as **Exhibit D** is a true and correct copy of ANNEX 6: ETSI Intellectual Property Rights Policy, ETSI Rules of Procedure, March 39, 2022 located at <https://www.etsi.org/images/files/IPR/etsi-ipr-policy.pdf> (last visited July 5, 2022).

7. Attached as **Exhibit E** is a true and correct copy of emails between G+ Communications, LLC and Samsung Electronics Co., Ltd.

8. On March 5, 2022, G+ Communications, LLC filed suit in the 6th Business Court of Rio de Janeiro in Brazil against Samsung Eletrônica Da Amazônia LTDA for damages for infringement of Brazilian Patent No. BR112012019729-0 and unfair competition, with request for preliminary injunction under the following case number and caption: Case No. 0081472-49.2022.8.19.0001; Case Name: G+ Communications, LLC v. Samsung Eletrônica Da Amazônia LTDA.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on July 5, 2022, in Dallas, Texas.

/s/ Bradley D. Liddle  
Bradley D. Liddle